

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CAROL DOUGHERTY,	:	Case No. 1:04CV1682
Plaintiff	:	
	:	Judge Kane
v.	:	
	:	
CIBER, INC.,	:	
Defendant	:	

ANSWERS TO INTERROGATORIES DIRECTED
TO PLAINTIFF-FIRST SET

Plaintiff, by and through counsel, submits the
following responses to Defendant's Interrogatories:

1. List and describe all expenses and losses that you have incurred because of the termination of your employment by CIBER and provide the detailed calculation by which you arrived at each expense and/or loss.

ANSWER:

Lost wages, future wages, and health and prescription
drug coverage, dental benefits, vision benefits, life
insurance benefit, attorneys fees, and 401(k) withdrawals.

16. Describe with specificity your actual presentation regarding HR and Recruiting at the October 23, 2003 meeting and identify all notes, documents referred to and handouts associated with that presentation.

ANSWER:

Due to the length of the meeting, the HR and Recruiting Plan was not reviewed so Plaintiff had no opportunity to present this information. Ms. Dougherty had prepared handwritten notes and the HR/Recruiting Plan was on her laptop in anticipation of making the presentation.

17. Describe with specificity your meeting with Ann Griffiths on September 16, 2003.

ANSWER:

During the September 16, 2003 meeting, Plaintiff and Ms. Griffiths discussed her recent performance at CIBER. Ms. Griffiths indicated that she was very surprised to receive negative feedback from Ms. Dougherty's co-workers stating that Ms. Dougherty was out of focus, incompetent, made errors on the job and did not work 40 hours a week. In response to this Ms. Dougherty replied that she felt that she had a lot of items to be working on in addition to her routine workload, including a golf tournament that CIBER was coordinating for the benefit of the Keystone Breast Cancer Coalition.

Ms. Griffiths and Ms. Dougherty discussed that Ms. Dougherty's performance was being adversely affected by an ongoing poor relationship with Ms. Heistand. Ms. Dougherty gave examples of problems with Ms. Heistand, including Ms. Heistand taking complaints about Ms. Dougherty to her supervisors instead of discussing them with her, being rude to Ms. Dougherty at company social events, disagreements between Ms. Dougherty and Ms. Heistand regarding how to deal with employees whose job performance was not satisfactory, Ms. Heistand complaining about other employees, and an unwillingness, on Ms. Heistand's part to

work as a team. Ms. Griffiths and Ms. Dougherty discussed ways to improve that relationship and came to an agreement on positive ways to address some of these issues. Included in these were talking with Ms. Heistand regularly in a friendly chit-chat, which Ms. Dougherty had already started to do, and inviting Ms. Heistand to the Keystone Breast Cancer Council luncheon, which Ms. Dougherty agreed to do. Ms. Griffiths expressed frustration over being dragged into this disputed between Ms. Heistand and Ms. Dougherty.

Ms. Griffiths explained that Ms. Dougherty might come to work 15 minutes early or so to get rid of the impression that she does not work 40 hours a week. Ms. Griffiths explained that she knew Ms. Dougherty was working at least 40 hours per week. Ms. Dougherty expressed committed to do what was needed to improve her performance. Ms. Griffiths said she was glad to hear this was Ms. Dougherty's attitude and that these issues were fixable.